

ORAL ARGUMENT NOT YET SCHEDULED**IN THE UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

 AGUDAS CHASIDEI CHABAD OF
UNITED STATES,
Plaintiff-Appellee,

v.

 RUSSIAN FEDERATION; RUSSIAN MINISTRY
OF CULTURE AND MASS COMMUNICATION;
RUSSIAN STATE LIBRARY; AND RUSSIAN
STATE MILITARY ARCHIVE,
Defendants-Appellees,

TENEX-USA, INCORPORATED,

Appellant.

Case No. 23-7036

Consolidated with No. 23-7037

**APPELLANT TENEX-USA’S UNOPPOSED MOTION FOR
EXTENSION OF TIME TO FILE OPPOSITION TO
MOTION TO DISMISS**

Pursuant to Federal Rule of Appellate Procedure 27(a)(3) and D.C. Circuit Rule 27(h), Appellant Tenex-USA, Incorporated (“Tenex-USA”) respectfully moves this Court for a four-day extension of the current deadline for its Opposition to the Motion to Dismiss filed by Plaintiff-Appellee Agudas Chasidei Chabad of United States (“Chabad”). Tenex-USA’s Opposition to Chabad’s Motion to Dismiss is currently due to be filed by Monday, May 22, 2023. If the Court grants this

Motion, Tenex-USA's Opposition thus would be due on Friday, May 26, 2023, and Chabad's Reply on Friday, June 2, 2023. Tenex-USA has conferred with counsel for Chabad, and Chabad does not oppose this Motion for Extension.

Tenex-USA requests this extension due to several pre-existing conflicts during the 10-day period for preparing its Opposition. In particular, multiple members of the counsel team have been engaged in an arbitration hearing this week. In addition, several other members of the counsel team already had pre-arranged international travel during the week of May 16, 2023. Because of these conflicts, Tenex-USA requires additional time to confer with its client and co-Appellant and prepare its opposition.

For these reasons, Tenex-USA respectfully requests that this Unopposed Motion for Extension be granted, and that Tenex-USA be permitted to file its Opposition by Friday, May 26, 2023.

Dated: May 17, 2023
Washington, DC

Respectfully submitted,

WHITE & CASE_{LLP}

/s/ Carolyn B. Lamm

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CERTIFICATE OF COMPLIANCE

This document complies with the type-volume limitation of Rule 27(d)(2)(A) of the Federal Rules of Appellate Procedure. This motion contains 208 words (as calculated by the automatic word count function of Microsoft Word), excluding the parts of the motion exempted by Rule 32(f) of the Federal Rules of Appellate Procedure.

This document complies with the typeface requirements of Rule 32(a)(5)(A) of the Federal Rules of Appellate Procedure and the type-style requirements of Rule 32(a)(6) of the Federal Rules of Appellate Procedure because this document has been prepared in a proportionally spaced typeface in 14-point Times New Roman font.

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CERTIFICATE OF SERVICE

I hereby certify that on May 17, 2023, a true and correct copy of the:

MOTION FOR EXTENSION OF TIME

by **APPELLANT TENEX-USA, INCORPORATED** was served by electronic filing on the following counsel of record:

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I further certify that on May 17, 2023, a true and correct copy of the foregoing

MOTION FOR EXTENSION OF TIME

by **APPELLANT TENEX-USA, INCORPORATED** was served by registered mail on each of the following parties:

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